

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 20-13619-ELF
Waldo Alfaro d/b/a All Decorative Concrete, LLC	:	Chapter 13
d/b/a Smart Remodeling Solutions, LLC and	:	
Rositsa Manolcheva d/b/a Rositsa Alfaro d/b/a All	:	
Decorative Concrete, LLC	:	
Debtors	:	
	:	
Legacy Mortgage Asset Trust 2020-GS1 c/o	:	
Rushmore Loan Management Services, LLC	:	
Movant	:	
vs.	:	
Waldo Alfaro d/b/a All Decorative Concrete, LLC	:	
d/b/a Smart Remodeling Solutions, LLC and	:	
Rositsa Manolcheva d/b/a Rositsa Alfaro d/b/a All	:	
Decorative Concrete, LLC	:	
Debtor/Respondent	:	
and	:	
William C. Miller, Esquire	:	
Trustee/Respondent	:	

OBJECTION TO CONFIRMATION OF THE PLAN

Legacy Mortgage Asset Trust 2020-GS1 c/o Rushmore Loan Management Services, LLC (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtors, Waldo Alfaro d/b/a All Decorative Concrete, LLC d/b/a Smart Remodeling Solutions, LLC and Rositsa Manolcheva d/b/a Rositsa Alfaro d/b/a All Decorative Concrete, LLC (“Debtors”), as follows:

1. As of the bankruptcy filing date of September 08, 2020, Movant holds a secured Claim against the Debtors’ property located at 675 Eagle Road, Newtown, PA 18940.
2. Movant is in the process of filing a Proof of Claim by the 11/16/2020 bar date, with an estimated secured claim in the amount of \$516,388.14, and estimated pre-petition arrears in the amount of \$9,391.29.
3. The Plan currently proposes payment to Movant in the amount of \$0.00 for pre-petition arrears.
4. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).
5. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.

6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtors is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Dated: 11/04/2020

Respectfully submitted,

/s / Antonio Bonanni, Esquire
Antonio, Bonanni, Esquire
Hladik, Onorato & Federman, LLP
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Waldo Alfaro d/b/a All Decorative Concrete, LLC	:
d/b/a Smart Remodeling Solutions, LLC and	:
Rositsa Manolcheva d/b/a Rositsa Alfaro d/b/a All	:
Decorative Concrete, LLC	:
Debtor/Respondent	:
and	:
William C. Miller, Esquire	:
Trustee/Respondent	:

**CERTIFICATE OF MAILING OF OBJECTION TO THE PROPOSED
PLAN TO PARTIES IN INTEREST**

I, Antonio Bonanni, Esquire, attorney for Legacy Mortgage Asset Trust 2020-GS1 c/o Rushmore Loan Management Services, LLC ("Movant"), certify that I served a copy of the attached Objection to the Plan to the parties below on 11/04/2020:

Carol B. McCullough., Esquire
Via Electronic Filing
Attorney for Debtors

William C. Miller, Esquire
Via Electronic Filing
Trustee

Waldo Alfaro
Rositsa Manolcheva
675 Eagle Road
Newtown, PA 18940
Via First Class Mail
Debtors

Date: 11/04/2020

Respectfully Submitted,
/s / Antonio Bonanni, Esquire
Antonio, Bonanni, Esquire
Hladik, Onorato & Federman, LLP
Attorney I.D. # 322940
298 Wissahickon Avenue
North Wales, PA 19454
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